AT&T

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EX PARTE OR LATE FILED

December 12, 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D. C. 20554

Re: Ex Parte -- CC Docket 96-98
Implementation of the Local Competition Provisions
of the Telecommunications Act of 1996

Dear Mr. Caton:

On Thursday, December 12, 1996, Mr. Bob Falcone, Mr. Wayne Fonteix, Ms. Karen Weis and I met with Mr. Robert S. Tanner, of the CCB Policy and Planning Division, to discuss provisioning the unbundled network elements platform, shared transport and operational support systems. As part of the meeting we showed a visual comparison of RBOC and AT&T Central Offices locations in two states -- Maryland and Massachusetts. The attachments were used as the basis of the discussion.

Two (2) copies of this Notice are being filed with the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's rules.

Sincerely,

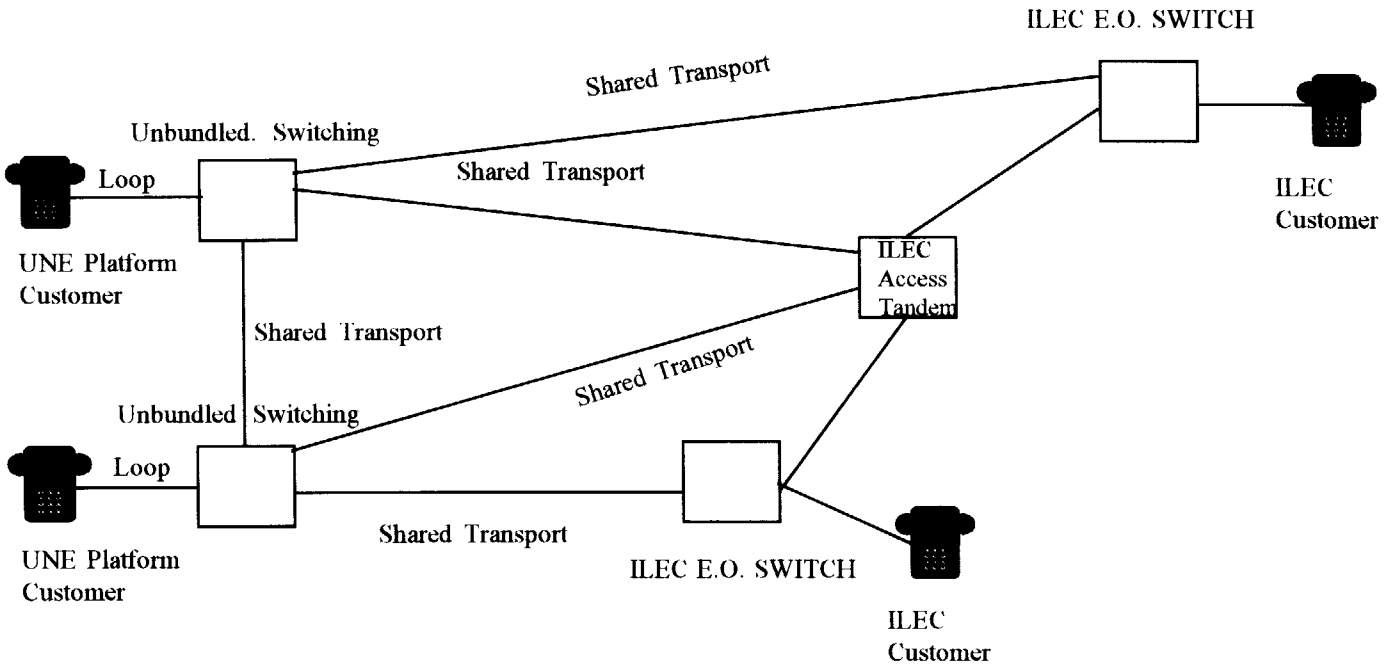
Bruce K. Cox

Attachments

cc: Mr. Tanner

No. of Copies rec'd 0+2
List ABCDE

# Combined Network Elements or Platform Architecture




***UNE Platform Customer Can Make Local and Toll Calls To Other UNE Platform Customers and ILEC Customers Using Unbundled Network Components***

# AT&T Proposal

- CLECs must be allowed to provide competitive local service using any combination of ILEC network elements including the platform combination.

- The common elements, those elements that are on the network side of the switch and are not dedicated to a single end user, will be defined and ordered by existing ILEC switch geography.

- The common elements can be ordered by the CLEC and provisioned by the ILEC based on a single order covering a specific geographic area using the existing ASR process.

- Customer provisioning will be accomplished by using a customer specific order (local service request (LSR)). The CLEC will use the LSR to specify the unique characteristics needed to support the service requirements of an individual customer.

# Provisioning The Platform--
# Preparing The Service Area To Be Served

Steps Required:

1. Determine geography to be served by using existing ILEC local switches.
   Example:
   entire LATA - all ILEC switches would be listed on order document
   subset of the LATA - select switches would be listed on order document

2. Identify common elements which support switches that are required.
   Example:
   - Shared transport to be billed on a per minute per mile basis
   - out of band signaling to be billed on a usage basis
   - call related databases to be billed on a per query basis
   - tandem switching to be billed on a usage basis

3. Customized routing and dedicated transport for operator services & directory assistance will be identified on a switch by switch basis.

4. ASR process can be used to define service area and order common elements.

# Customer Provisioning-- Steps Required:

1--CLEC issues a customer specific order (LSR) to the ILEC
LSR includes both loop and switch provisioning information
2--ILEC issues an order confirmation or jeopardy to CLEC

3--ILEC provisions order based on information provided. This provisioning may include items such as:

- Loop and Port types
- 911 database updates
- Line Information Database (LIDB) updates
- Vertical features requested by the customer
- Directory listings update
- Directory assistance update
- Billing customer acount updates
- Change of long distance PIC code
- Provision of screening identifier for proper operator service and directory assistance routing

4--ILEC issues an order completion to CLEC

# Customer Provisioning via ILEC Systems & Data Bases Updates

| Function | Update Required ? | Action Required |
|---|---|---|
| 911 Customer Data in ALI Data Base | Yes<br>No | Software Change Only<br>No Action Required |
| LIDB Customer Calling Card and Screening Information | Yes<br>No | Software Change Only<br>No Action Required |
| Vertical Features | Yes<br>No | Software Change Only<br>No Action Required |
| Directory Listings/Assistance | Yes<br>No | Software Change Only<br>No Action Required |
| Toll PIC Change | Yes<br>No | Software Change Only<br>No Action Required |
| Selective Routing of OS/DA | Yes<br>No | Software Change Only<br>No Action Required |
| Billing Customer Account Change | Yes | Software Change Only |

# Shared Transport

FCC Order:

Paragraph 440 states "We require incumbent LECs to provide unbundled access to shared transmission facilities between end offices and the tandem switch."

Paragraph 447 states "Accordingly, we conclude that the section 251(d)(2)(B) requires incumbent LECs to provide access to shared interoffice facilities and dedicated interoffice facilities between the above identified points in incumbent LEC's networks, including facilities between incumbent LEC's end offices, new entrant's switching offices and LEC switching offices, and DCSs."

# Shared Transport--ILEC View

Ameritech - " Ameritech Illinois has taken the position that, in order to qualify as a network element, unbundled transport must be unbundled from switching and must be a dedicated facility to which one carrier subscribes or which is shared by several carriers." "In Ameritech Illinois' view "common transport" is not a network element."

Ameritech - In response to question if ICC should attempt to resolve the issue of whether common transport qualifies as an unbundled network element:
"No. This is properly an FCC issue, since it involves interpretation of the FCC's Order in Docket 96-98 and the FCC's rules. Since the FCC will clearly have to resolve the carriers' request for "common transport" in its order on reconsideration, there is no reason for this commission to attempt to resolve it now based on an incomplete record."

--Ameritech rebuttal testimony of David H. Gebhardt;
ICC Docket 96-0404; p. 53, 54, 55

# Shared Transport--ILEC View--cont'd

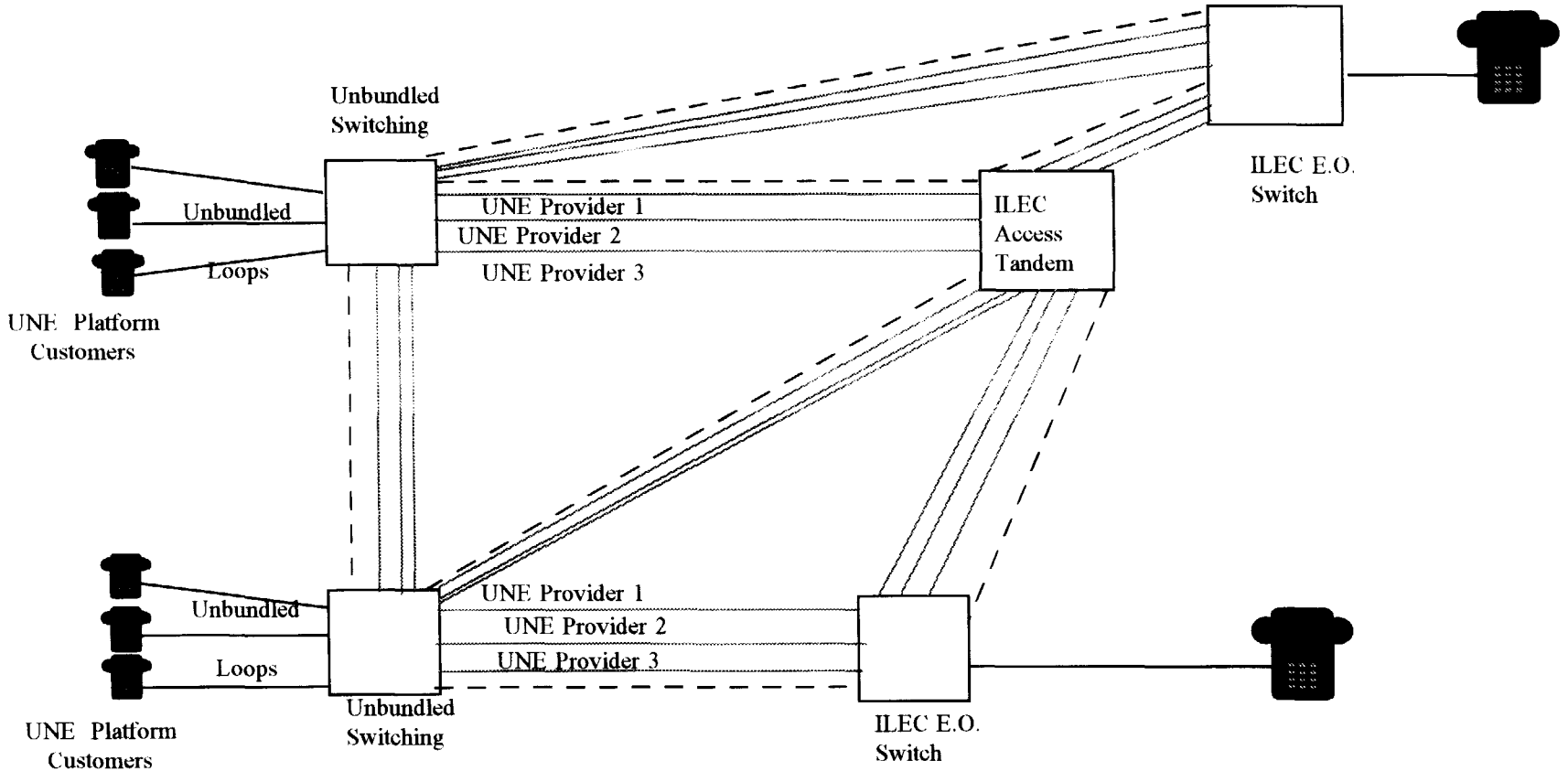
NYNEX - "Traditionally, shared facilities are only provided by an incumbent LEC between its central offices and its tandems, and not between its central offices and the switching facilities of another carrier. NYNEX is concerned that the Order could be interpreted to require LECs to generally provide shared facilities between all points in the incumbent LEC's network. NYNEX supports the LEC Coalition's request that the Commission clarify that the Order does not so require."

--NYNEX Comments in Petitions to Reconsider and/or Clarify First Report and Order in CC Docket No. 96-98, 10/31/96; p. 10

BellSouth - "A rebundling of common and dedicated transport facilities into a common transport service would constitute the provision of a service, not an unbundled element under the 1996 Act".

--BellSouth's Reply to the Oppositions and Comments in the Petitions for Reconsidertion and/or Clarification in Docket 96-98, 11/14/96; p. 5

# ILEC Proposal For Unbundled Element Combination or Platform

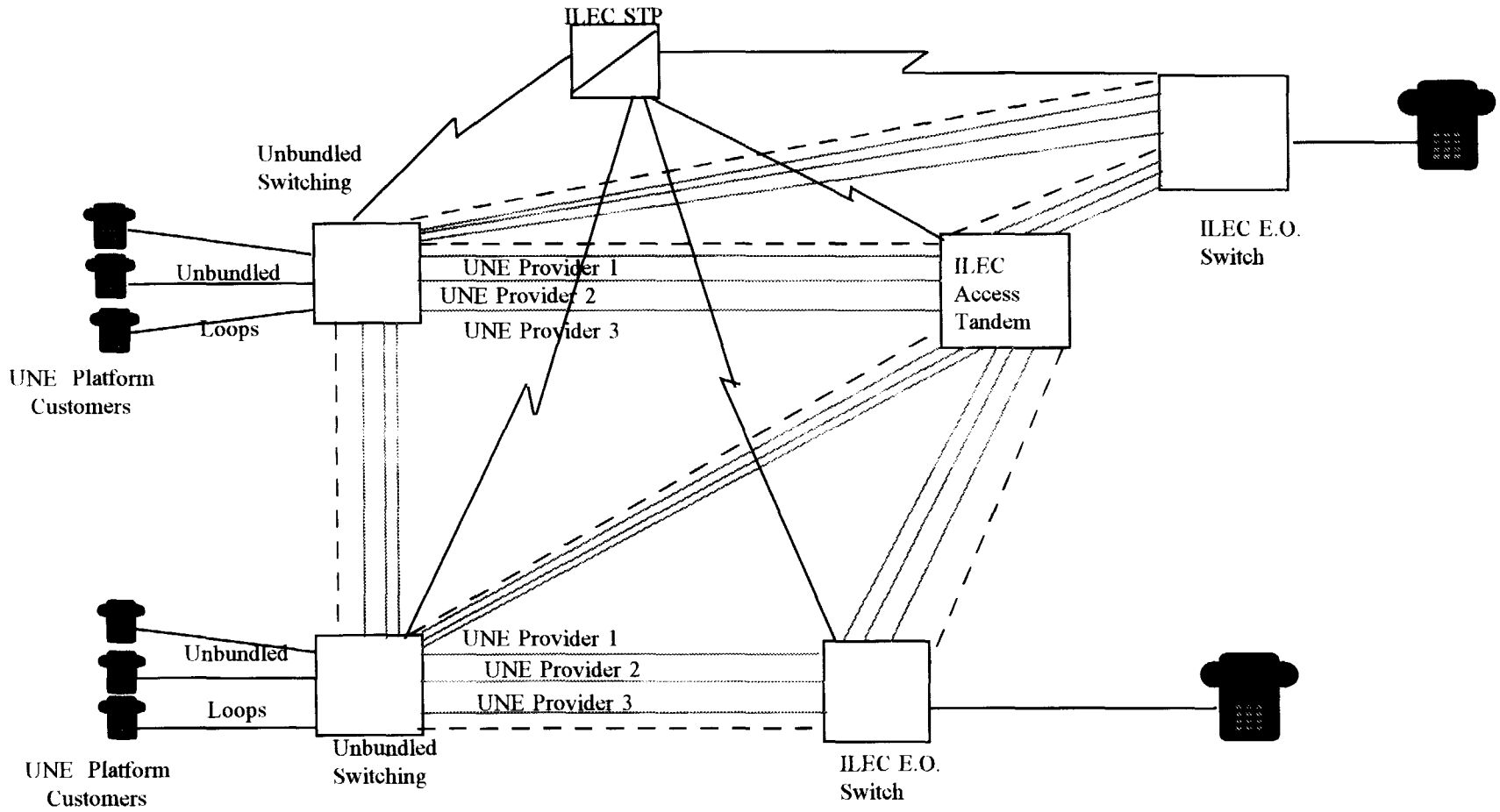



***CLECs Must Purchase Dedicated Transport Between End Offices and Tandem Switches In Providing Local and Toll Calling To UNE Platform Customers***

ILEC Transport – –

CLEC Transport ——

# ILEC Proposal For Unbundled Element Combination With Signaling




***CLECs Must Purchase Dedicated Transport Between End Offices and Tandem Switches In Providing Local and Toll Calling To UNE Platform Customers***

ILEC Transport – –

CLEC Transport ——

# ILEC Proposals Foreclose Implementation of the Platform Combination

1. Poor utilization of interoffice transport may result in new construction and uneconomic investment by new entrant.

   Assumes the CLEC's can properly engineer a transport network without the benefit of any historical traffic data, including traffic volumes or peak load studies for specific customer lines.

   Traffic routed to tandems instead of directly between end offices will leave ILEC with under utilized facilites and will require inefficient build outs to the tandems.

2. Potential trunk port exhaust on ILEC switches due to requirements for redundant dedicated trunk groups.

3. ILEC switches must be capable of selective routing for <u>all</u> CLEC traffic.

   Every customer change requires administrative support for changes to all the selective routing codes.

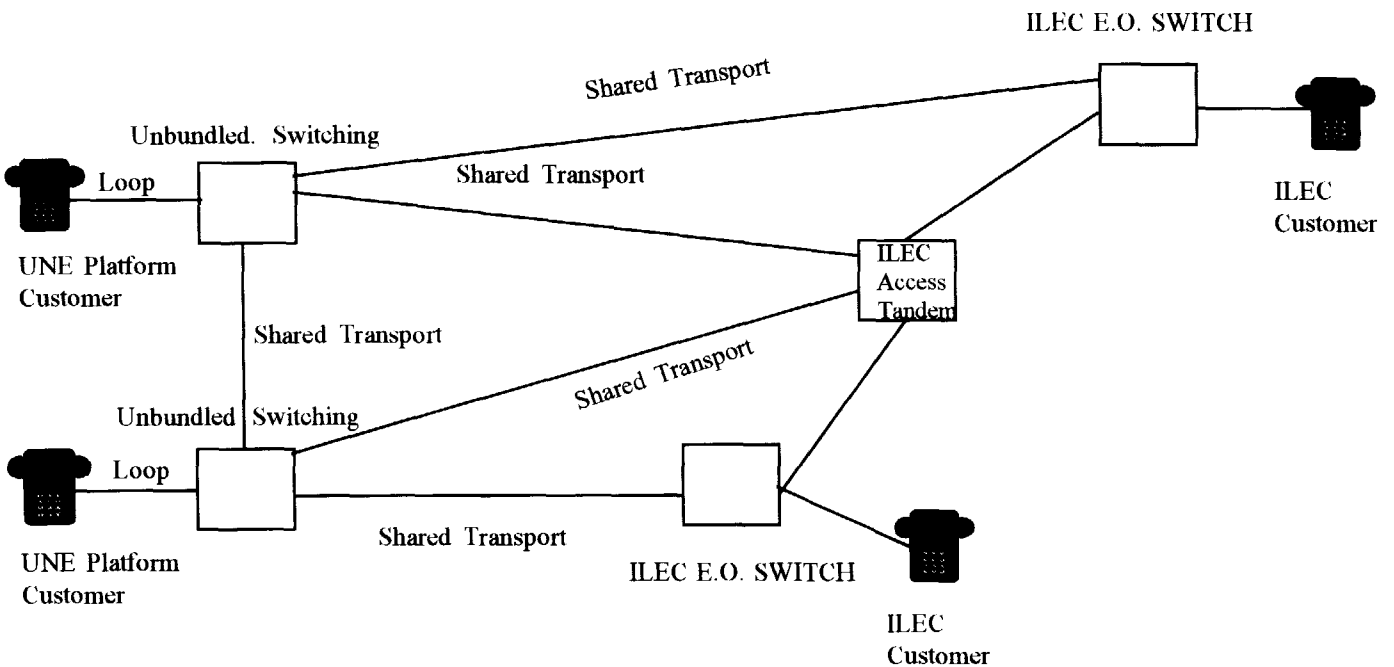
   Code manipulation and changes increase potential for routing error on customer lines.

# Shared Transport--AT&T's View

A CLEC, when purchasing the unbundled switching network element, cannot and should not be required to duplicate the ILEC's transport network that supports that switch. The CLECs must be able to share the ILEC's existing interoffice transport network with the ILEC whether from end office switch to end office switch or from end office switch to an ILEC tandem. This "shared transport" would be used to route the CLEC's end user customers' traffic in the same manner ILEC's customers' traffic is routed. This shared use of the transport elements is consistent with the shared use of switching, signaling and data base elements.

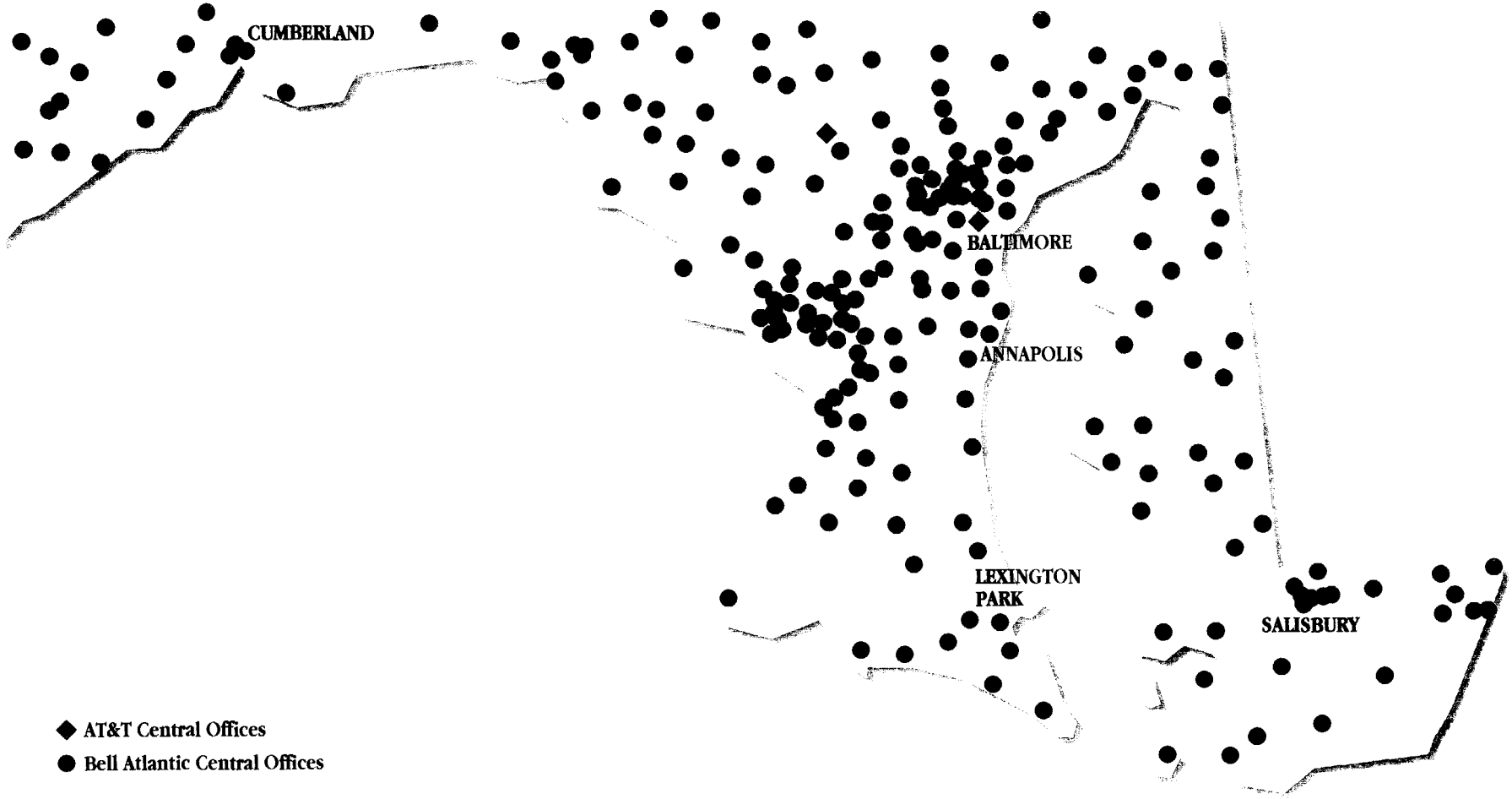
The CLEC will compensate the ILEC for the use of this transport based CLEC'S usage of the transport.

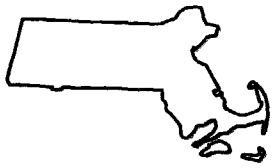
# Combined Network Elements or Platform Architecture




***UNE Platform Customer Can Make Local and Toll Calls To Other UNE Platform Customers and ILEC Customers Using Unbundled Network Components***

# AT&T Central Offices vs. Bell Atlantic Central Offices





# AT&T Central Offices vs. NYNEX Switch Locations